

Daniel: Thank you for joining today's NAREEE advisory board teleconference call. I would now like to introduce Michele Esch, Executive Director. Michele, please go ahead.

Michele: Thank you, Daniel. Good afternoon and good morning for those of you on the West Coast. Welcome to the meeting of the National Agricultural Research, Extension, Education, and Economics Advisory Board, otherwise known as the NAREEE Advisory Board. I'll do my best not to use too many acronyms today. This meeting is being held in accordance with the Federal Advisory Committee Act, section 1408 of the National Agricultural Research, Extension, and Teaching Policy Act of 1977, and the Agricultural Act of 2014.

This meeting is open to the public and we will have a public comment period at the end of the meeting. Before we go much further I'll do a quick role call for the board members on the line and for any of our ex-officio members also present. I'm going to just go through each of our categories and if you could all just state whether you're here or not. Ralph Paige? James Goodman? Okay, Daniel, are we having some technical issues...

Daniel: Yes, we actually have a participant on the speaker line who I guess has some audio on so I had to mute him for a moment. I tried to unmute him, but I guess he still has it on. Please make sure to get rid of any background noise on mutual lines until you hear your name for role call.

Michele: I'm going to send him a note, too. Is he the only one that's muted?

Daniel: That's is correct.

Michele: Okay. James Goodman are you on the line? Okay, Wathina?

Wathina: Yes.

Michele: Hi. Chalmers Carr?

Chalmers: Yes, I'm here.

Michele: Great. Jeremy Liley?

Jeremy: Here.

Michele: Govind Kannan?

Need Help? <mailto:support@rev.com>

Govind: Here, here.

Michele: Great. Robert Taylor?

Robert: Yes, here.

Michele: Great. Mark McClellan?

Mark: Present.

Michele: Patsy Brannon?

Patsy: Here.

Michele: Adriana Campa?

Adriana: Here. Good afternoon.

Michele: Thank you. Milo Schult?

Milo: Here.

Michele: Chandra Reddy?

Chandra: Here.

Michele: Chad Waukechon? Charles Boyer?

Charles: Here.

Michele: Agnes Mojica?

Agnes: Here.

Michele: Neil Olsen? Leo Holt? Nancy Childs?

Nancy: Present.

Michele: Great. Julia Sabin? Not here with us today. Twilya L'Ecuyer? Rita Green? She is not with us today. Steve Daley-Laursen]?

Steve: I'm here.

Michele: Great. Carrie Castille is joining us a little late. Steve Hamburg? And Dawn Thilmany?

Dawn: I'm here.

Michele: Great. I'll real quickly just go through the animal handling and welfare review panel members. Aaron Olsen?

Aaron: Here.

Michele: You may be our lone representative for the day. Stephen Ford? Mo Salman? Lonny Dixon? I know he's out of cell phone range today. John Clifford is not with us today either. In the room I have Dr. Cathi Woteki, Ex-Officio member representing the Research, Education, Economics mission area. I believe Sonny Ramaswamy you're on the phone as well?

Sonny: Yes.

Michele: Another Ex-Officio member representing Agricultural Research Service, Dr. Chavonda Jacobs-Young?

Chavonda: Hello ...

Michele: ... Oh great.

Chavonda: I'm here. Thank you.

Michele: Wonderful, thank you. I also have Bill Hoffman from NIFA and Caren Wilcox from REE in the room as well. Thank you all very much, to the members of the NAREEE Board, especially to the Animal Handling and Welfare Review Panel, and the REE staff, as well as the general public for attending the meeting today. As most of you know, the purpose of this meeting is to discuss the report and findings from the phase 2 review of the ARS Animal Handling and Welfare Review Panel and for the NAREEE Board to provide additional advice and guidance to USDA, as well as to accept additional public comments.

The final report from the Animal Handling and Welfare Review Panel can be found on the NAREEE Advisory Board website under meetings or at the REE website on the home page. As I stated earlier, this meeting is open to the public and we will hear public comment at the end of the meeting. Written comments can be submitted up until close of business today to the NAREEE Advisory Board at their email address, which is [NAREEE@ars.usda.gov](mailto:NAREEE@ars.usda.gov). All verbal and written public comments will be

entered into the public record and will be kept on file in the REE Advisory Board office.

Real quickly just an overview of our call today, obviously, I just did a role call and introduced the panel members. I'm going to go through a quick review of the charge to the panel and then turn it over to Dr. Aaron Olsen, the chair of the Animal Handling and Welfare Review Panel, for a brief presentation of the findings and recommendations from the report. The board will have some discussions and then lastly we'll spend the remainder of the call receiving public comment.

Before I get started I'm going to turn it over to our chair of the NAREEE Board, Milo Shult, for any opening comments.

Milo: Thank you, Michele. I'll be very brief because I think we have some important business to attend to. I just would like to express appreciation to both members and the panel members and guests for participating. We have an excellent turnout. We also will have a number of members of the public who I believe will provide comments. We look forward to a very productive meeting. I think I will just pass, Michele you come back and carry out the 2 remaining parts of the first portion.

Michele: Okay, great. Thank you so much, Milo. Yeah, I'll echo Milo's sentiments, a big thank you to the panel for their hard work over the past few months. The Animal Handling and Welfare Review Panel was established by the Secretary of Agriculture under the authority of section 1409(a) of the National Agricultural Extension and Teaching Policy Act, in order to review the Agricultural Research Service's research animal care and well-being, policies, procedures, and standards for agricultural, livestock, and ARS research.

I want to stress that the focus of the charge to the Animal Handling and Welfare Review Panel was on the current status of the Animal Care and Youth programs at ARS. This panel was not charged to review any of the historical research activities and information. Phase 1 of this charge required an immediate review of the US Meat Animal Research Center (US MARC) in Clay Center, Nebraska, which was completed in March of this year. Information regarding phase 1 can be found on the REE and the NAREEE Advisory Board website. Phase 2 of the review, which is the focus of this call, included an expanded review of ARS facilities where livestock research is conducted.

The panel visited 5 additional ARS facilities in order to review the on-site facilities, pens and fields, where animals are housed, to look at the animal handling procedures at these locations, to review the IACUC documentation and the function, including the processes used to select topics and the evaluation of experimental designs and protocols under the IACUC, and also to assess the training programs and needs of the animal care staff at each of these locations. The panel was asked to make site specific, and ARS-wide recommendations based on their reviews.

The panel held a public meeting on July 14th to present the draft report and then the final report was made publicly available on July 23rd, in conjunction with the release of the federal register notice for this meeting. This is the last step in the charge to the Animal Handling and Welfare Review Panel, for them to present their report to the NAREEE Board and provide additional advice and guidance.

After this call, the NAREEE Board will present any additional recommendations that they come up with to the Secretary and Under Secretary by next week.

That's a brief overview of the charge. Milo, unless you have something to add, I'm going to turn it over to Dr. Aaron Olsen, the chair of the panel to present a brief overview of the report and the findings and recommendations.

Aaron: Thank you, Michele.

Michele: Okay, great. Thanks, Aaron.

Aaron: All right, I will jump in here then. Thank you, Michele. It has been my opportunity to serve as the chair for this review panel over the past several months. We would like to provide a brief overview of the report that was prepared as a result of the site visits that we've conducted. As Michele indicated, this is the phase 2 and so this report will focus on the additional sites that were visited after the initial site visit to US MARC in Nebraska. We selected a series of 5 sites. The methodology in which we approached these sites was we wanted to identify research sites where animal research was ongoing.

It would give us an opportunity to observe animals directly being handled, as well as an opportunity to review the processes by which these animals were worked with, in which the oversight of the research was provided. The panel members were provided with a complete list of

all research facilities and the sites that were selected were based off of those criteria of trying to identify somewhat of a cross-section of the type of research being conducted with ARS to try and gain a broad view of both the research, as well as more particularly the oversight practices.

As a result, we identified 5 specific research sites. I will refer anybody with interest in specific recommendations about the sites to the report for today, for the sake of brevity, I will mention the sites that we visited. There were at least 2 panel members at each site and all panel members were invited to attend any site that they so choose. The sites that were visited included the Livestock and Range Research Laboratory located in Miles City, Montana. We also visited the Livestock Behavior Research Unit, co-located with Purdue University, in Lafayette, Indiana.

There were visits to 2 facilities that were located adjacent to each other: these are the Southeast Poultry Research Laboratory and the Richard B. Russell Agricultural Research Center, both located in Athens, Georgia. The fifth, and final, site that was visited is the National Animal Disease Center located in Ames, Iowa. At each site, the panel members worked to try and have a consistent site visit and specifically some of the activities that were conducted at each site were a physical inspection of animal handling facilities.

Whenever and wherever possible we sought opportunity to observe animals being handled in a research setting depending upon the species that were present, and we also spent time interviewing, both as a group and as individuals, key members of the animal care team. Specifically we met with IACUC members. We also met specifically with the attending veterinarian, as well as the research leaders at each facility. Then in addition to that we reviewed research protocols and we discussed and reviewed the methods by which research protocols received oversight and approval from the IACUC.

From those site visits, we have identified a handful of findings and recommendations that we would like to make broadly to ARS in general. Our first finding, I'd like to lead off and say first and foremost, in no instance, as we observed animals at these multiple research sites, did we see any evidence of abuse or neglect of the animals that we observed.

We found routinely that the individuals involved with animal care to be very conscientious and anxious that their animals be well cared for while fulfilling their research mission and we found that the animals themselves appeared to be very healthy and appeared to be very well

cared for. Having said that, we do have some findings and recommendations we'd like to make.

Our first finding is that the role and the expectations of the Institutional Animal Care and Use Committee (IACUC) and attending veterinarian is not uniformly understood at all agricultural research services sites. We observed that there were a variety of models, in regards to the creation of the IACUC. By that we mean that at the various sites we visited there were varying degree of sharing of resources between the research facility and (where present) other institutions of higher education.

On the 2 extremes, we observed that at the Livestock Behavior Research Unit in Lafayette, Indiana, the research program of the ARS facility was completely integrated with that of Purdue University, and the members of the ARS research team there had the opportunities to serve on the university IACUC. All of their research was reviewed and approved by that same university IACUC. Additionally, as needed, they would use university facilities and resources to meet their needs.

On the other end of that spectrum we found the National Animal Disease Center in Ames, Iowa, was a completely standalone facility in that they did not have any formal relationship with an institution of higher education or a university, but they also did have a properly constituted IACUC. The other institutions that we visited had differing degrees of relationship between themselves and other research institutions, the universities.

Having said that, we wish to emphasize that we believe that any of the models that we observed can adequately function to meet the oversight needs associated with animal research; however, we did observe that there was sometimes varying degrees of understanding of the roles that the key members of the IACUC can play and additional opportunities there for training and enhancement of that understanding of the IACUC members.

With that finding, we would like to make the recommendation that the ARS should work to harmonize the expectations of the IACUC and its members across all sites that use animals in research. With that, we gave a series of suggestions or recommendations under that primary recommendation. We would encourage the ARS to explicitly state the roles, responsibilities, and authority of the IACUC and attending veterinarian and its policies and procedures.

We emphasize that there's an absolute need to provide the adequate administrative and financial support for the operation of an IACUC functions. We would encourage ARS to provide additional training opportunities both within and without the ARS on the roles and function of the IACUC to develop means for greater communication between ARS units and with institutions outside of ARS to expand the understanding of the proper role and function the IACUC.

The ARS sites that are working in a cooperative manner with universities or other institutions do so under a very clearly written document that guides the responsibilities of the associated parties. Again, we want to emphasize that we found the individuals to be anxious to do what was right and at times though there was a lack, perhaps, of understanding or training that would help them to completely fulfill their obligations there, and so we would encourage the expanded opportunities associated with that.

Our second finding is that, at times, service on oversight committees, such as the IACUC, can be viewed by the research members of ARS as being a diversion from their job responsibilities. We recognize that the ARS scientists and research staff, their primary function and their primary role is to conduct research in support of the ARS mission. With that, the time commitment associated with providing service on a committee can sometimes be viewed as a burden rather than as an opportunity. We need to emphasize the vital role that the IACUC can play in helping to enhance animal welfare, to enhance research activities, and to provide adequate oversight.

With that finding, we would like to make the recommendation as a panel that participation in research oversight activities, such as service on IACUC, as well as other associated oversight boards, should be an important part of an individual's career path and that such service should be appropriately considered and recognized during routine personnel evaluations and as part of considerations for advancement or promotion.

We recognize, as I say, the vital role that the IACUC can play and that service on such committees should be recognized both for the time commitment, as well as the quality of service that can be provided there.

One of the roles of our panel was to also evaluate and to make recommendations in regards to the physical facilities. We did not find physical facilities that were inadequate at this time, but we do recognize



that many ARS sites have aging facilities and that with these aging facilities will come additional challenges in being able to maintain them.

The panel would like to make the recommendation that adequate funding should be provided to maintain current facilities and also provide the upgrades or replacement of those facilities.

We have a third finding in that individuals within ARS display appropriate and sometimes exceptionally good animal handling and care; however, there is often times limited opportunity to disseminate best animal care practices between ARS facilities or to the broader research and agricultural communities.

In particular, we noted as a panel that at the National Animal Disease Center located in Ames, Iowa, they have an opportunity to work with what we would consider to be uncommon species, animals that would generally be considered wild. There are many excellent animal care staff present there who've extended themselves to identify new, unique, and enhanced ways to provide excellent animal care to those various species. We also saw other people who were anxiously engaged in trying to provide the best quality care for animals.

In interviews we noted that there was limited opportunities for them to share those enhanced techniques across different ARS facilities or with the broader community. With that finding we would make the recommendation that ARS should provide means for animal care staff to share innovations and best practices, both within and without the ARS organization.

Concurrent with sharing those best practices, ARS should develop means to identify and appropriately recognize individuals who provide exceptionally good animal care and/or develop unique and innovative techniques, which lead to improved animal welfare.

In conclusion, we wish to, again, emphasize that the panel members did not observe or identify animals that were being misused or abused or mistreated. We found many individuals who were very anxious and fully engaged in the process of animal care, looking for opportunities to enhance and improve that animal care in any way that they could.

With that, we do believe that there are ways in which ARS can improve its oversight activities, primarily through training of the IACUC and its members, and through recognizing those individuals both serving on the

IACUC and also those individuals who identify those unique and innovative ways of enhancing animal care. With that, I will turn the time back over to Michele and conclude my overview of the report.

Michele: Thanks, Aaron. Really appreciate. Really I keep saying it, but thank you very, very much for your leadership to the Animal Handling and Welfare Review Panel. We're lucky to have you on it. Now, I believe, we're going to open the discussion up to the board members to discuss the report and any potential recommendations that you would have for USDA. Milo, do you want to kick it off?

Milo: Well, I would first of all say that we appreciate, as you said, the efforts of the committee. I think considering the charge that the committee had, which was to really look at what is actually happening, they did an excellent job in looking at those facilities and the recommendations that they have come forward with. I would like to say to the NAREEE board members and the ex-officio members that now is the time if you see anything in the report that you would like to either expand on or to request clarification on I'd like to open it up for any comments that can come from the board right now. Any specific comments that you have?

Speaker 8: Milo, this is Mark. I have a question for Aaron. Aaron, it's very clear through your report a cornerstone to your review and expectations of good operations is the IACUC. Are you still convinced that the IACUC is an optimal management tool and when implemented that it does work well, or have you discovered things here that might cause you to question that approach?

Aaron: Generally speaking about research facilities in general, I do believe that an IACUC is currently the best method that we have. I will qualify that by saying that the members of an IACUC certainly influence and make up its quality, but when you have a fully-engaged IACUC with people who are anxious and interested in animal care it can, and will, provide excellent oversight for the research activities to ensure that animal welfare is a prime consideration as people propose and conduct research.

If I may just use a specific example, one of the ways in which an IACUC can promote animal welfare is by sometimes asking the appropriate questions about research methodology and research structure. This doesn't mean that they are experts necessarily in every field, but anybody who is a professional can sometimes benefit by having somebody else force them to question their assumptions and thereby improve their processes and their expectation.

I do firmly support and believe in the role of an IACUC and the way that it can support and enhance animal research and provide over-adequate and even improved animal welfare through its IACUC.

Speaker 8: Thanks, Aaron.

Milo: Other comments or questions?

Agnes: Milo, this Agnes. First of all let me congratulate you with the committee because this is a very good report. In terms of recommendation 2 on page 16, I see that the expectation that individuals in their career development path should see this as an opportunity, not as a burden. Are those expectations discussed with the researcher or with the participants?

Milo: Say the last sentence again, Agnes.

Agnes: Are those expectation that they are going to be involved as part of their career development rather than see it as a responsibility that takes too much time or something like that, is that expectation discussed with them?

Milo: Aaron? At the facilities – did you see any evidence of that?

Aaron: Do I have evidence that that was happening in the past? I do not. That's a big part of the reason we felt to make it one of our recommendations. We wanted to emphasize that all too often service on oversight committees, and I do include other oversight committees in addition to the IACUC that often times it is viewed as an additional responsibility rather than a core component of an individual's career and work responsibilities.

Therefore, that's why we, as a committee, felt to make that recommendation that the opportunity to serve on these oversight committees be moved to perhaps from the edges of their responsibility to a core function as they enter these research institutions.

Agnes: Excellent. The second question, on page 17 when you mentioned to share best practices, ARS having their web page a section that allows to share and recognize best practices throughout these sites?

Aaron: We were very careful not to make recommendations on how they should share these best practices. We'll leave that up to ARS to determine. I will just make comments that the standard model with which I'm most

familiar is through scientific conferences and publications, just like we would for the research themselves, but I would hope that there would be opportunities, again, within ARS, as well as within the broader community for these practices to be shared because anything that enhances animal welfare is desirable and should be shared with the broader community.

Agnes: Thank you.

Milo: Anyone else?

Aaron, I've got essentially 2 questions. One is that this is a very important and a very dynamic process. You, I know, and your panel, have been aware of what things have transpired thus far in response to your initial set of recommendations. Can you make a comment - do you see some very visible movement and very visible signs that your recommendations are being taken very seriously by USDA and they're advancing in directions that your panel would feel comfortable with?

Aaron: I believe so. This is, as you say, a dynamic process, but also one that takes time to fully institute and implement these changes. I will, however, say that the changes that I am currently aware of, as well as some of those that are being considered and discussed, I do believe are moving in the right direction and will certainly help to enhance the oversight activities of the IACUC and the associated animal welfare aspects associated with that oversight. My answer, in the short, is yes. I do believe we're moving in the right direction.

Milo: Good.

A related question, it's related to your responsibilities and the charge that came to you was to really see things that were happening now. And let me ask you, based on what you see, and what things that you have recommended that you see changing, one of the things that we have seen has been legislation introduced that would change the basic legislation involving animal welfare.

If we have current legislation in place, and if we have policies that are amended that are commensurate with what your recommendations are and if we have regulations coming from legislation that truly are strong, do you see or think that we might or might not need a change in the legislation, but really simply to reinforce and have strong support for current legislation and regulations and expanded policies?

Aaron: I hope this will adequately answer the question, my personal professional opinion on this is that if ARS will robustly enforce its upgraded policies and procedures that that can and should and will eliminate these concerns in regards to animal oversight. This, however, does come back to one of our primary recommendations in regards to essentially education and training of personnel. We recognized as a panel that the ARS research facility and research structure overall has a very diverse set of facilities scattered across this country. As a result, there needs to be a certain degree of flexibility for them, but also we have to recognize that they need to be provided adequate training and information on how to complete their IACUC and animal welfare oversight responsibilities.

In brief, I do not personally believe that enhanced legislation is necessary. I believe that the proper changes can be made, and should be made through enhanced enforcement of ARS policies and procedures, as well as refinement of those same policies and procedures.

Milo: Very good. Other comments from members of the NAREEE board? I would include any comments from ex-officio members.

Nancy: This is Nancy Childs. I have a question. First, thank you a very thorough and important report. I'm not sure whether my question is really to the purview of the mission of the report, but do the different facilities have any guidance on how to handle communication of any type of incident or disaster type situation?

Aaron: May I ask for maybe just a little clarification? We explicitly discussed with the different facilities what the process was if somebody had a concern about animal welfare, how was it reported and how was it handled. In my mind, in my approach, I would deal with that separately from dealing with issues of either natural disasters or extreme weather. I just want to make sure that I'm answering the question appropriately.

Nancy: I'm on the latter situation.

Aaron: Okay.

Nancy: Your natural disaster. I just didn't know whether you had any comments or advice on how that would be handled.

Aaron: We, as a panel, did not ask that type of question explicitly. There are certainly guidelines and a lot of information throughout the community and throughout the profession generally to provide oversight on that, but

as a panel we did not investigate or evaluate that portion of their animal care program.

Nancy: I see.

Milo: Other thoughts or comments?

Speaker 10: This is Adriana Campa. When I read the report I saw several instances where there were, in different facilities, conflicts of interest in the way the IACUC was appointed or who were in the IACUC. I think that it's important that conflict of interest is wider distributed and included in the training.

Milo: Okay. Does everyone understand that? Aaron are you comfortable with that?

Aaron: I agree. A recognition, again, though that in some of these facilities they're dealing with a relatively small staff and, therefore, complete avoidance of conflict of interest may be difficult, but I believe that there are appropriate methods of dealing with that, whether that be recusing an individual from reviewing a specific research protocol, etc. But I do want to emphasize that we did see very diverse research institutions, some with relatively small staff and some with much larger staff, which gave them a great flexibility.

Adriana: That would be [inaudible 00:35:19] to the fact that sometimes it would be better to have a different IACUC reviewing research when there could be conflict of interest in facilities.

Aaron: Yeah, and I would definitely support additional training and guidance on what constitutes conflict of interest and how to deal with that.

Adriana: Thank you.

Milo: Other comments from the board?

Jim Goodman: This is Jim Goodman.

Milo: Yes, sir.

Jim Goodman: I understand that the charge of the committee was not to specifically look into the types of research projects that [inaudible 00:36:08] with the New York Times article, but it seemed from reading the public comments from the previous meeting in April that that was what people were most upset

about, some of the previous experiments. I guess I just wondered if the committee had any discussion about how research protocols were set at USDA, if there was any oversight on that [inaudible 00:36:34] controversy of those types of experiments like at the US MARC Center.

Aaron: This is Aaron again. We did review that to a certain degree during our initial visit at US MARC and found that the overarching guidance of the type of research instituted was established at the national level through a combination of user group input, as well as group various individuals within the agency. We did not pursue that further in these additional site visits as a question.

We did, however, evaluate how individual research protocols and experiments were reviewed and oversight was given. We did not try to delve deeper into how the national programs were developed and constructed.

Milo: I believe I'm correct also that the issues that you raised will be dealt with in the inspector general's office report that's due in a few months. Is that correct? Michele, is that correct?

Michele: That's correct. OIG, the Office of Inspector General, is currently investigating the historical allegations that were originally in the article. I know that's currently underway, but we do not have a time frame of when that will be finalized.

Milo: Any other comments or questions from the board?

Let me point out, what we will do is we will take the comments that have taken place and we will also take into account public comment that comes in and then we will provide, as we did with phase 1, a letter to Dr. Woteki and the secretary with any statements that the board feels should help reinforce what the panel has come up with, or further suggestions in dealing with the issue. And we will be doing that in a fairly short time frame.

I just will remind the members, you can provide comments to Michele of anything that you might like to see included in that. We will have that report in draft form for the entire board to review and approve [inaudible 00:39:22] to send it forward.

Michele, if I have no other comments from the board then I believe that we could proceed to public comment, is that correct?

Michele: I believe so. I know we had quite a few discussions about questions about the report and clarification. There are a couple of things that really stood out about using IACUC as the best tool to ensure animal care, and that we obviously all support the role of the IACUC at the different facilities. I'm just going through my notes really quickly. I think one of the things that really stood out was talking about training for conflict of interest and appointing the members of the IACUC.

Those were the key things that I heard in the discussion. If there are any others that would be considered recommendations to USDA and to ARS I think that we would want to hear those now since we're in public session. Is there anything else that I missed?

Mark: Good summary.

Milo: Who was that?

Michele: That was Mark.

Mark: It's Mark. I was just saying that was a good summary.

Milo: Okay, good, good.

Aaron, let me say this, I think I can say this on behalf of the board, you all had a difficult assignment. You stayed on point with your charge and I believe that our board would like to say congratulations to you and your panel for the process that you went through and the recommendations that you came forward with and we appreciate your efforts very much.

Aaron: Thank you. I appreciate that, and I'll share that with our board members.

Speaker 19: Dr. Olsen, this is Cathie Woteki. I'd like to add our thanks as well. We know that you kept up a blistering schedule in the early summer with all the site visits that were conducted. We really much appreciate the professional manner in which you have led this panel and brought the report forward. We look forward to receiving, from the NAREEE board, its comments and further recommendations related to the implementation of the recommendations that the panel has made.

Please convey to the other panel members my thanks for their hard work. And we are very much are looking forward to the public comments.

Aaron: Thank you. I appreciate that. I will be certain to share those comments with our panel members.



Michele: Good. Okay, so thank you to the board for all of your discussion as well. I really appreciate all your questions and comments. We will go ahead and enter the public comment period. For those that wish to speak we're very interested in hearing your thoughts and comments. Please be reminded that the board members will not respond directly to any comments or questions made. You can send any specific questions in writing to USDA or directly to the NAREEE Advisory Board for an official response. I'm going to go ahead and turn the call back over to the moderator, to give instructions for the public comment period.

Daniel: Okay, thank you Michele. If you'd like to participate in our public comment, please dial \*1 on your phone to be placed in the queue. You will hear notification when your line is unmuted. Please then state your name and organization. Thank you.

Speaker 22: Hi, my name is Vicky Catrinick, and I'm speaking on behalf of the Humane Society of the United States. Thank you for the opportunity to provide public comment today in response to the July 23rd final report, pertaining to ARS facilities. We appreciate the agency's decision to extend this investigation, to include 5 additional sites. We also wish to thank the panel for providing additional information about how sites were selected and what information was reviewed during the visit, in the final version of the report.

However, we remain concerned the facilities were notified and told what documents would be reviewed prior to the inspection. We also wish that the panel had been able to review more than just active research projects, as past research may have more accurately revealed historical problems with the facility's IACUC. We are hopeful that the findings at US MARC prompted changes at all ARS facilities to correct any and all animal welfare issues.

However, without proper oversight, we are concerned that animal welfare improvements may be temporary and inconsistent across ARS locations. While the report shows that those 5 facilities each have a stronger IACUC in place than the ones found at US MARC, it is apparent that ARS still has multiple improvements to make. Some of the problems identified include a lack of understanding across IACUCs regarding how to respond to animal welfare concerns, the lack of publicly available whistleblower policies, absence of an acceptable attending veterinarian, and deficiencies in the proper constitution of IACUCs.

HSUS supports the panel recommendations laid out in the July 23rd report that pertain to these problems.

As stated during the July 14th public meeting, we wish to reiterate our appreciation of the Animal Welfare Action Plan. Since the USDA is responsible for enforcing animal welfare requirement at research facilities, we believe the agency should serve as a leader in following animal welfare regulations and should seek APHIS inspections of all its facilities. That is why were pleased to see in the action plan that ARS is following Animal Welfare Act and public health services requirements, and that employees are receiving training in compliance with these standards.

We are also encouraged that ARS is registering its facilities with APHIS and seeking inspection. We ask APHIS to carry out rigorous, unannounced inspections of all USDA facilities and make the results public. In order to ensure transparency and accountability, we urge USDA to require facilities to submit annual reports of animal research activity. The USDA should also make use of AWIC resources to provide both ARS staff and IACUC members with appropriate animal care and use training.

Thank you again for the opportunity to comment, and we hope you will take further action as requested.

Speaker 23:

Hi there. My name is Debra Press, I'm calling on behalf of the American Society for the Prevention of Cruelty to Animals. Thank you for the opportunity to comment and for the panel's increased attention to animal welfare. We appreciate and support the panel's recommendations, but would like to see some additions in the final report if possible.

It appears that there's some confusion about ARS policies and procedures with regard to animal welfare. The report says multiple times that IACUC are compliant with ARS policies and procedures, but the panel documents many problems with IACUC compliance at the same time and that seems inconsistent.

A facility that fails to comply with IACUC requirements is not compliant with ARS policies. Currently, there are 2 ARS policies, 130.4 that says it's ARS policy to include all vertebrate animals used in research under the IACUC provisions outlined in 9 CFR 2C of Animal Welfare Act. There's also directive 635.1. It would be helpful in the final report if the panel summarized its understanding of what ARS policies and procedures are,

so that we understand exactly what it believes the facilities are compliant with.

There was just a lot of inconsistency there. We'd also, in the final report, like to hear from the panel how it selected the 5 facilities and describe the extent of its records review and its inspection at each facility. From our perspective, the report was helpful, but often very conclusory and changed outcomes without telling us how they were arrived at. And that leaves us with a lot of question.

We would appreciate some elaboration in the final report if that's a possibility. Like HSUS, we recommend collaboration with Animal Plant and Health Inspection Service on review of these facilities, of their protocols and of their IACUCs. Thanks.

Daniel: Okay, Michele, that is all for public comment today.

Michele: Do we have any final public commenters?

Daniel: That'll be all, Michele.

Michele: Okay. This concludes our public comment period. Again, I will thank everyone for joining the call and providing public comments, and then especially to the NAREEE Advisory Board members for joining and for your time today, and lastly to the Animal Handling and Welfare Review panel for their time. Just really can't thank you enough.

Milo, do you have any closing comments?

Milo: No, only express appreciation as you did to everyone who participated and we appreciate the public comments. With that, anything else from the board?

That being the case I believe without exception we can adjourn the meeting.

Michele: I agree.

Milo: Okay, we'll stand adjourned.

Michele: Thank you.